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September 29, 2008

**VIA ELECTRONIC FILING  
AND FACSIMILE**

The Honorable Michael A. Shipp  
United States Magistrate Judge  
M.L. King, Jr. Federal Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: **Walsh Securities, Inc. v. Cristo Property Management, Ltd., et al.;**  
**Civil Action No. 97-3496 (DRD) (MAS)**

Dear Judge Shipp:

This firm represents Third Party Defendant Elizabeth Ann DeMola in the above-referenced matter. This letter is written to respectfully request permission from the Court to file a motion to be relieved as counsel for Ms. DeMola.

Alternatively, should this firm receive consent from Ms. DeMola and there be no objections, then we respectfully request that the Court grant this firm's withdrawal by Consent Order.

Ms. DeMola recently advised me that she would not pay this firm for past or future services. In addition, it has been difficult to converse, meet or correspond with Ms. DeMola on any consistent basis, which makes rendering timely and appropriate advice problematic. Under these circumstances, I do not believe that I can properly represent Ms. DeMola.

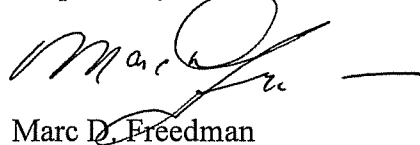
Should the Court require the filing of a motion, then we respectfully request the opportunity to address any issues concerning privilege to the Court under seal and, if further required, by *in camera* review. In the interim, this letter should not be deemed as, nor is it intended to constitute, the waiver of any privileges by Ms. DeMola.

The Honorable Michael A. Shipp  
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Plaintiff Walsh Securities, Inc.'s pending Motion for Leave to File a Fourth Amended Complaint ("Plaintiff's Motion") was scheduled for oral argument on September 19, 2008. As previously explained to the Court by various counsel both in correspondence and during conference, the Court's determination of Plaintiff's Motion will impact how Ms. DeMola responds to the Amended Third Party Complaint of Commonwealth Land Title Insurance Company. Accordingly, among other things, the Court recently ordered Ms. DeMola to answer, move or otherwise respond to the Amended Third Party Complaint within ten (10) days of the Court's entry of an order respecting Plaintiff's Motion. Until such time, Ms. DeMola will have not yet responded to the Amended Third Party Complaint. Moreover, although a deposition subpoena duces tecum was served on Ms. DeMola, the deposition has not yet been scheduled.

For the foregoing reasons, this firm respectfully requests that its request to be relieved as counsel be granted either by permission to so move or by Consent Order.

Respectfully submitted,



Marc D. Freedman

cc: Betty Ann DeMola (via Certified Mail Return Receipt  
Requested, Federal Express, and regular mail)  
Robert A. Magnanini, Esq. (via electronic filing and fax)  
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**CIVIL ACTION NO. 97-3496 (DRD)**

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